

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**IN RE PAYMENT CARD  
INTERCHANGE FEE AND MERCHANT  
DISCOUNT ANTITRUST LITIGATION**

**This Document Applies to:**

*Progressive Casualty Insurance Co., et al. v.  
Visa Inc., et al., No. 14-cv-00276 (E.D.N.Y.)  
(MKB) (JO).*

**No. 14-md-01720 (MKB) (JO)  
No. 14-cv-00276 (MKB) (JO)**

**STIPULATION AND PROPOSED ORDER**

WHEREAS, the plaintiffs in *Progressive Casualty Insurance Co., et al. v. Visa Inc., et al.*, No. 14-cv-00276 (E.D.N.Y.) (the “Progressive Casualty Action”), have filed a complaint as opt-outs from the Rule 23(b)(3) Settlement Class in *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, No. 05-md-01720 (E.D.N.Y.);

WHEREAS, on or about September 30, 2014, defendants filed answers to the complaint in the Progressive Casualty Action; and

WHEREAS, on December 31, 2014, this Court granted plaintiffs’ motion to amend the complaint to add new allegations and plaintiffs without the filing of an amended complaint, and ordered that certain parties be added as plaintiffs to the Progressive Casualty Action;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that each defendant need not provide any further answer or response to the complaint as amended in the Progressive Casualty Action.

Dated: January 8, 2015.

Respectfully submitted,

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**SO ORDERED:**

Dated:

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Brooklyn, New York

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United States District Judge